

May 25, 2004

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 03-66

Dear Chairman Powell:

Since the 1985/1986 academic year, California State University, Sacramento (CSUS) has effectively used Instructional Television Fixed Service (ITFS) channels in the 2.5 GHz band to transmit instructional programming to students in public and private centers throughout the greater Sacramento and Grass Valley region. The university has four A group stations serving Sacramento and one B4 station in Grass Valley. It offers a wide range of academic programs for college credit, typically enrolling 6,500 students in 60 courses annually.

The development of two-way digital technology will open the door to a wide-range of new opportunities supporting not only video-based delivery using streaming, but also a variety of two-way applications that will enrich California State University, Sacramento's educational mission. Indeed, the university has developed a business plan for its channels under the band plan proposed by the "Coalition" that includes creating its own ISP service using the lower band channels, while using its mid-band channel for downstream video digital transmission.

It is our understanding that the Wireless Bureau is proposing rules that would reduce the amount of spectrum held by each ITFS licensee. Although this would support commercial users, it would seriously impinge upon the educational community, the campus' academic programs and strategic plans now and in the near future. In addition, the idea of allowing commercial entities to hold licenses by bidding on ITFS spectrum is the antithesis of why the spectrum was set aside for educators, state agencies, religious entities and non-profit organizations in the first place.

The use of ITFS frequencies for the express purpose of providing educational and academically related services is a priceless commodity that we cannot afford to lose. For California State University, Sacramento, this has meant the capacity to deliver undergraduate, graduate, continuing education, and public service.

As the president of a university that relies heavily on this delivery system, I urge you to reconsider any modifications that would jeopardize the use of the ITFS channels in ways

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that would turn it into purely commercial spectrum or reduce the total amount of spectrum allocated to each licensee in the ITFS band.

The university has always been an effective and efficient user of these channels and will continue to take advantage of the new opportunities in this state-of-the-art technology. Should you have any questions concerning our programs and commitment here at California State University Sacramento, please do not hesitate to contact Associate Vice President Spencer Freund at 916 278-5764 or spencerfreund@csus.edu.

Thank you for your consideration of this important matter.

Sincerely,

Alexander Gonzalez
President

AG/kn

- c. Commissioner Kathleen Q. Abernathy
Commissioner Jonathan S. Adelstein
Commissioner Michael J. Copps
Commissioner Kevin J. Martin